

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHER DISTRICT OF ILLINOIS**

ML FASHION, LLC, and ML RETAIL,

Plaintiffs,

v.

NOBELLE, STEPHANIE MENKIN, SARIT  
MAMAN NAGRANI, and NICOLAS  
GOUREAU,

Defendants.

C.A. No. 1:20-cv-05124

**DECLARATION OF NICOLAS GOUREAU IN SUPPORT OF DEFENDANTS’  
RESPONSE TO THE COURT’S QUESTIONS IN ITS JANUARY 19, 2021 MINUTE  
ORDER (DKT. NO. 55)**

I, Nicolas Goureau, hereby declare as follows:

1. I am over the age of eighteen and a defendant in this case. I make this declaration in support of Defendants' Defendants' Response To The Court's Questions In Its January 19, 2021 Minute Order (Dkt. No. 55). I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. I have absolutely no involvement in my sister's new company Nobelle. I have not used the computer at issue and did not log on to the computer in August 2020 as alleged by Plaintiffs. The computer is a legacy computer that originally belonged to Gooberry Corp. the company that ran Courage.B, our clothing and retail venture prior to our involvement with Marcus Lemonis. I was the CEO of Gooberry so the user account was my name.

3. In 2016, Marcus Lemonis iced me out of ML Fashion. I was cut off from access to company information and property and even told I could not visit the ML Fashion stores. As such, I have not had access to any computer at issue and again, did not log on to it in August 2020.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 3<sup>rd</sup> day of February 2021 at Atlanta, Georgia.



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Nicolas Goureau